

Response to comments on the meaning of "system"

The examiner noted the following:

The definition of "system" provided on page 6 from the Meriam-Webster dictionary includes multiple definitions that make the interpretation of "hard disk system" reasonably include multiple hard disk drives. In the first example in the definition, number system includes multiple numbers. In the sixth example, telephone system includes multiple telephones. And in the seventh example, a highway system includes multiple highways. From these examples it is clear that a hard disk drive system can include multiple hard disk drives. The Applicant is reminded that the Examiner is required to give the claims the broadest reasonable interpretation, and that the term "hard disk drive system" include multiple hard disk drives in a system.

A number system is actually a system of rules used to represent numbers and does not have to include the numbers themselves.

A telephone system does include multiple telephone *terminals*, among other things. However, the word "telephone" is by itself ambiguous and means either the "telephone terminal" or the "telephone system" which includes the telephone network and its terminals. "Using a telephone" really means using at least two telephone terminals and infrastructure between them. A telephone terminal is by itself useless and can not operate without the rest of the "telephone system" regardless of how the user connects it.

Contrary to this, a "hard disk drive" is not ambiguous within the field of computer science. It specifically denotes a single unit or device comprised of a (hard disk drive) system of (multiple) disks or platters and supporting framework and logic. A hard disk drive (system) does not require anything outside of itself in order to be used. Any device capable of powering and communicating with it can use it.

This is not true for the telephone system. Simply communicating (talking to) and powering a telephone will not enable any use of the "telephone" (terminal) without the rest of the telephone system. Therefore the meaning of the "system" in the context of "telephone" and "hard disk drive" is not the same.

The word "system" simply denotes an entity that is comprised of multiple parts, which is true for almost any computing device. Same is true for the term "device" – most devices are systems (of other devices).

The term "hard disk drive" by itself is also very ambiguous without the context, as it may indicate any type of a device that drives hard disks or a hard type of a drive that drives any disks. However, it is a well established term and also described in the description of my invention beyond any doubt. The entire invention is concentrated around a single hard disk drive (system) and not multiple hard disk drives. At least within this context the term "hard disk drive system" should be very clear.

Without the proper context no term is fully self-explanatory. Neither "hard disk drive" nor "hard disk drive device" nor "hard disk drive unit" precisely explain what they relate to and depend on context. Therefore, I have found no better term than "hard disk drive system" as my invention actually modifies that system as it existed in prior art. If the US PTO has an opinion on which term it should be to indicate this I will only be too happy to accept the amendment. Within the claim 16, all appearances of the word "system" could be removed.